

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Post Office Structure Plan

Docket No. N2012-2

INTERROGATORIES OF THE PUBLIC REPRESENTATIVE TO  
POSTAL SERVICE WITNESS JEFFREY C. DAY  
(PR/USPS-T1-1-11)

June 8, 2012

Pursuant to 39 C.F.R. §§3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 in Docket No. N2012-1 and dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully submitted,

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PUBLIC REPRESENTATIVE INTERROGATORIES TO  
POSTAL SERVICE WITNESS DAY (SET 1)

PR/USPS-T1-1. The following refers to the POStPlan offices that are scheduled to have reduced Post Office window hours. Your testimony indicates that the realignment of window service hours will take into consideration the community meeting feedback to determine the time of day retail window hours will be available. USPS-T-1 at 19.

- a. For those POStPlan offices that currently do not offer Saturday hours, does the Postal Service plan to offer Saturday hours at each office? At any offices? Please explain why or why not.
- b. Will window service hours be the same for each day of the week that a given POStPlan office is open? If not, why?
- c. Will late afternoon retail window hours be available at each office at least once a week? If not, please explain how the Postal Service plans to provide retail window service for customers who are unable to get to the Post Office during normal weekday business hours. For example: 8:00 a.m. to 5 p.m. Monday through Friday.

PR/USPS-T1-2. The following refers to your testimony (USPS-T-1) at 16. You indicate that the Postal Service will annually review the Adjusted Earned Workload (AEWL) for all Level 2, 4, and 6 Remote Post Offices (RMPOs) and Part-time Post Offices (PTPOs). The review may alter the number of hours each is open.

- a. Upon completion of the annual review, will RMPOs and/or PTPOs be subject to a discontinuance study?
- b. If your response to part “a” is affirmative, please explain the criteria the Postal Service will use to determine whether a discontinuance study of a RMPO and/or PTPO is warranted.
- c. Please provide examples of “other changes that could result in the reclassification of certain Post Offices.”

PR/USPS-T1-3. Please provide examples of “the operational needs of the Postal Service” as that phrase is used at pages 17-18 of your testimony. Please explain when “the operational needs of the Postal Service” would lead to discontinuance even if a “communit[y] [wishes] to maintain [its] existing Post Office.” USPS-T-1 at 24.

PUBLIC REPRESENTATIVE INTERROGATORIES TO  
POSTAL SERVICE WITNESS DAY (SET 1)

PR/USPS-T1-4. With regard to Post Offices that closed during FY2011 or during quarters 1 and 2 of FY2012, will the Postal Service resurvey communities to see if they would elect to have an RMPO or a PTPO in their community? If your response is other than affirmative, please explain.

PR/USPS-T1-5. The following question refers to your testimony at 21. Please provide a copy of the POSTPlan community survey that the Postal Service will begin distributing in September 2012.

PR/USPS-T1-6. Please refer to your testimony at 17. You state that “after candidate Post Offices are identified, Postal Service personnel will survey customers to solicit their preference for realigned window service hours or discontinuance study ....”

- a. Please provide a copy of the survey to be used to solicit POSTPlan office customer preferences.
- b. If a formal survey is unavailable, please specifically explain how Postal Service personnel will gather customers' preferences.
- c. How will the Postal Service contact local residents of the proposed POSTPlan office to obtain their preferences?

PR/USPS-T1-7. You note that the Postal Service anticipates labor cost savings due to lower salary and benefit costs and a reduction in overall retail window hours. USPS-T-1 at 9.

- a. Please discuss whether or not you attempted to quantify the potential cost savings. If yes, please provide the cost saving estimate, the methodology used, and all data used for obtaining the estimate. If not, please explain.
- b. Please explain if you attempted to measure the impact of POSTPlan and reduced retail hours on Post Office revenue. Please provide an estimate of the impact (positive or negative) on Post Office revenue.

PUBLIC REPRESENTATIVE INTERROGATORIES TO  
POSTAL SERVICE WITNESS DAY (SET 1)

PR/USPS-T1-8. Please refer to Figure 5 that provides window service hours and average daily earned work load by Post Office classification after POSTPlan. USPS-T-1 at 10.

- a. Please discuss the basis for the new Post Office classification after POSTPlan.
- b. Did you attempt to estimate revenues and costs for each Post Office after realignment of window service hours with customer use to understand the potential impact of POSTPlan on Post Office efficiency?
- c. Based on Figure 5, there is a significant divergence between daily window service hours and average daily earned workload for level 4 and level 6 & PTPO Post Offices. Did you consider including additional Post Office classifications (such as, *Office level 3* with daily window service of 3 hours, and *Office level 5* with daily window service of 5 hours) to more closely match window service hours with customer use?

PR/USPS-T1-9. You state that Post Offices with more than 5.74 hours of Adjusted Earned Workload (AEWL) will be upgraded to EAS Level 18 or above, and those Post Offices with AEWL 5.74 or fewer hours will either be realigned with customer use or may be studied for discontinuance. USPS-T-1 at 10. Please explain how the 5.74-hour cut-off is determined and the justification for it.

PR/USPS-T1-10. You note that EAS Level 18 or above Post Offices will continue to be evaluated through the Workload Service Credit (WSC/PS Form 150) process, whereas Remotely Managed Post Offices (RMPOs) and Part-Time Post Offices (PTPOs) will be evaluated annually through a modified Customer Service Variance (CSV) or Small Office Variance (SOV) program. USPS-T-1 at 10.

- a. Please provide a discussion of the methodology and data sources used for calculating CSV or SOV.
- b. How often will the EAS Level 18 and above offices be evaluated through the WSC process? Will these Post Offices be correspondingly upgraded or downgraded based on WSC results regularly?

PUBLIC REPRESENTATIVE INTERROGATORIES TO  
POSTAL SERVICE WITNESS DAY (SET 1)

PR/USPS-T1-11. Based on the results of surveying 1,024 customers, the Postal Service asserts that communities will prefer to keep local Post Offices open with realigned hours. USPS-T-1 at 19-20.

- a. Please explain if the 1,024 customers are a representative sample of the Post Office customers.
- b. Please discuss the approach used for selecting the sample and the reliability of the results in approximating the preferences of all customers.
- c. What was the sample frame?
- d. Please provide the data and information described in rules 31(k)(1) and 31(k)(2)(i), irrespective of whether the Postal Service believes that the survey constitutes a “statistical study.”